

1 DAVID B. GOLUBCHIK (State Bar No. 185520)  
2 TODD M. ARNOLD (State Bar No. 221868)  
3 LEVENE, NEALE, BENDER, YOO & GOLUBCHIK L.L.P.  
4 2818 La Cienega Avenue  
5 Los Angeles, California 90034  
6 Telephone: (310) 229-1234  
7 Facsimile: (310) 229-1244  
8 Email: [dbg@lnbyg.com](mailto:dbg@lnbyg.com); [tma@lnbyg.com](mailto:tma@lnbyg.com)

9 Attorneys for Debtor and Debtor in Possession

10 **UNITED STATES BANKRUPTCY COURT**  
11 **CENTRAL DISTRICT OF CALIFORNIA**  
12 **LOS ANGELES DIVISION**

13 In re:

14 CRESTLLOYD, LLC,

15 Debtor and Debtor in Possession.

Case No.: 2:21-bk-18205-DS

Chapter 11 Case

**DEBTOR'S NOTICE OF MONTHLY FEE  
STATEMENT OF SIERRACONSTELLATION  
PARTNERS, LLC**

[October 1, 2022 through October 31, 2022]

[No Hearing Required, Unless Timely Opposition and  
Request for a Hearing is Filed]

1           **PLEASE TAKE NOTICE** that, (A) on October 28, 2021, Crestlloyd, LLC, the Chapter  
2 11 debtor and debtor in possession herein (the “Debtor”), filed a *Notice of Setting/Increasing Insider*  
3 *Compensation* (the “Notice of Insider Compensation”) for SierraConstellation Partners LLC/Lawrence  
4 R. Perkins (“SCP”) and served it on the UST and other parties, (B) on November 16, 2021, the United  
5 States Trustee (the “UST”) filed its *Objection To Notice Of Insider Compensation* (the “Objection”)  
6 [Dkt. 35] objecting to SCP’s Notice of Insider Compensation, (C) on December 13, 2021, the Debtor  
7 filed its *Stipulation [With the UST] (1) Resolving UST Objection To Notice Of Insider Compensation*  
8 *And (2) Vacating Hearing Thereon* (the “Insider Compensation Stipulation”) [Dkt. 72], (D) on  
9 December 16, 2021, the Court entered its *Order Approving Stipulation [With the UST] (1) Resolving*  
10 *UST Objection To Notice Of Insider Compensation And (2) Vacating Hearing Thereon* (the “Insider  
11 Compensation Order”) [Dkt. 77].

12           **PLEASE FURTHER TAKE NOTICE THAT**, pursuant to the Insider Compensation  
13 Stipulation and Insider Compensation Order, “SCP must file monthly fee statements [each a “Fee  
14 Statement”] and serve the UST therewith, and, absent an objection by the UST or some other party in  
15 interest within seven (7) days thereafter, the fees and costs may be paid in full. In the event of an  
16 objection, the undisputed portion may be paid without prejudice to the balance subject to order of the  
17 Court.”

18           **PLEASE FURTHER TAKE NOTICE THAT**, consistent with the foregoing procedure,  
19 on December 12, 2021, the Court entered its *Interim Order* [the “DIP Order” [Dkr. 70]] *Granting*  
20 *Motion For Order: (I) Authorizing Debtor To Obtain Senior Secured Postpetition Financing Pursuant*  
21 *To Section 364 Of The Bankruptcy Code, (II) Granting Super-Priority Administrative Claims And*  
22 *Senior Liens, (III) Scheduling A Final Hearing, And (IV) Granting Related Relief* [the “DIP Motion”]  
23 [Dkt. 66]], which, *inter alia*, granted the DIP Motion on an interim basis and approved the terms of the  
24 DIP Loan Documents,<sup>1</sup> which provide, among other things, that:

25                       Loan Proceeds shall be used solely in accordance with the Budget,  
26                       including for payment of the Facility Fee, Lender's reasonable  
27                       attorneys’ fees and costs incurred in making and documenting the  
28                       Loan, title insurance premiums, escrow fees, the Extension Fee,

---

<sup>1</sup> Capitalized terms not otherwise defined herein have the meanings ascribed to them in the DIP Motion.

1 and the Carve Out and Borrower's working capital needs and to  
2 administer the Chapter 11 Case, including insurance, repair,  
3 maintenance and construction costs with respect to the Property.  
4 With respect to the fees and costs of the Manager of the Debtor  
5 [*i.e.*, SCP], Manager [*i.e.*, SCP] shall file monthly fee statements  
6 and, absent an objection within seven (7) days thereafter, the fees  
7 and costs may be paid in full. In the event of an objection, the  
8 undisputed portion may be paid without prejudice to the balance  
9 subject to order of the Court.

10 **PLEASE FURTHER TAKE NOTICE THAT**, pursuant to the Insider Compensation  
11 Stipulation, Insider Compensation Order, DIP Motion, and DIP Order, SCP hereby files its Fee  
12 Statement for the period from October 1, 2022 through October 31, 2022. SCP reserves its right to  
13 supplement, amend, or modify the Fee Statement to include fees and/or expenses incurred during the  
14 foregoing period not covered in the attached Fee Statement or incurred subsequent to October 31,  
15 2022.

16 Annexed as **Exhibit "A"** hereto is the name of each professional who performed services  
17 for the Debtor in connection with this chapter 11 case during the period covered by this Fee Statement  
18 and the hourly rate and total fees for each professional during such period.

19 Annexed as **Exhibit "B"** hereto is the summary of hours in this Fee Statement broken up  
20 by partner and task.

21 Annexed as **Exhibit "C"** hereto are the detailed time entries for the period covered by this  
22 Fee Statement.

23 Annexed as **Exhibit "D"** hereto is the summary of expenses included in this Fee  
24 Statement.

25 Annexed as **Exhibit "E"** hereto are the detailed entries for the expenses covered by this  
26 Fee Statement.

27 **PLEASE TAKE FURTHER NOTICE** that objections, if any, to this Fee Statement  
28 must be filed with the Court and served so as to be received by the undersigned counsel to the  
Debtor no later than seven (7) days after the filing of this Fee Statement.



# EXHIBIT "A"

**Summary of SierraConstellation Partners Professional Fees by Consultant**

For the Period October 1st through October 31st

<b><u>Consultant</u></b>	<b><u>Title</u></b>	<b><u>Rate</u></b>	<b><u>Hours</u></b>	<b><u>Total</u></b>
Lawrence Perkins	CEO	\$790	0.80	\$632.00
Roger Gorog	Senior Director	\$580	16.50	\$9,570.00
Colin Moran	Senior Associate	\$235	6.10	\$1,433.50
			<b>23.4</b>	<b>\$11,635.50</b>

*Note: As of August 1st, 2022, Roger Gorog's hourly rate increased to \$580*

# EXHIBIT "B"

**Summary of SierraConstellation Partners Professional Fees by Activity**

For the Period October 1st through October 31st

<b><u>Activity / Consultant</u></b>	<b><u>Title</u></b>	<b><u>Hours</u></b>	<b><u>Rate</u></b>	<b><u>Total</u></b>
<b><u>Business Operations, Cash Management &amp; CRO Support</u></b>				
Lawrence Perkins	CEO	0.80	\$790	\$632.00
Roger Gorog	Senior Director	15.40	\$580	\$8,932.00
Colin Moran	Senior Associate	2.00	\$235	\$470.00
<i>Activity Total</i>		18.20		\$10,034.00
<b><u>Case Administration</u></b>				
Lawrence Perkins	CEO	0.00	\$790	\$0.00
Roger Gorog	Senior Director	0.00	\$580	\$0.00
Colin Moran	Senior Associate	3.10	\$235	\$728.50
<i>Activity Total</i>		3.10		\$728.50
<b><u>Invoices, Fees and Retention Applications</u></b>				
Roger Gorog	Senior Director	1.10	\$580	\$638.00
Lawrence Perkins	CEO	0.00	\$790	\$0.00
Colin Moran	Senior Associate	1.00	\$235	\$235.00
<i>Activity Total</i>		2.10		\$873.00



# EXHIBIT "C"

**Summary of SierraConstellation Partners Professional Fees by Professional Service**

For the Period October 1st through October 31st

<u>Date</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>Business Operations, Cash Management &amp; CRO Support</b>				
<i>Lawrence Perkins</i>				
10/26/2022	Correspondence re: cash management and MOR	0.80	\$790.00	\$632.00
Lawrence Perkins Total				\$632.00
<i>Colin Moran</i>				
10/21/2022	Followup emails re. MOR and payment of UST fee	1.00	\$235.00	\$235.00
10/28/2022	Review KCC emails and emails re: cash rates on current bank accounts	1.00	\$235.00	\$235.00
Colin Moran Total				\$470.00
<i>Roger Gorog</i>				
10/3/2022	Review selected payments and approve disbursements	1.30	\$580.00	\$754.00
10/4/2022	Review email update from counsel regarding adversary matters; review associated filings	2.10	\$580.00	\$1,218.00
10/5/2022	Review email from counsel regarding filed motion	0.90	\$580.00	\$522.00
10/7/2022	Exchange emails with bank to discuss interest rates and account options	1.20	\$580.00	\$696.00
10/11/2022	Review docket report and latest case filings	1.30	\$580.00	\$754.00
10/12/2022	Read and respond to email from bank regarding account status	0.70	\$580.00	\$406.00
10/14/2022	Review emails from counsel regarding settlement payments; review and approve wire payments	2.20	\$580.00	\$1,276.00
10/20/2022	Review monthly operating report, bank balances and activity	2.30	\$580.00	\$1,334.00
10/26/2022	Discuss bank accounts and interest bearing accounts; discuss timing of distributions with counsel to determine appropriate bank account actions	1.50	\$580.00	\$870.00
10/27/2022	Review bank activity and interest earned on accounts; discuss timing for potential disbursements	0.80	\$580.00	\$464.00
10/28/2022	Communicate with bank regarding interest rate and potential higher interest offer for funds on hand	1.10	\$580.00	\$638.00
Roger Gorog Total				\$8,932.00
<b>Case Administration</b>				
<i>Colin Moran</i>				
10/3/2022	Emails and payment related to July fees for SCP	0.50	\$235.00	\$117.50
10/10/2022	Review Axos Bank account information and send cash balance to Legal Team	0.60	\$235.00	\$141.00
10/14/2022	Process payments for Vesta and SCP payments	0.50	\$235.00	\$117.50
10/20/2022	Compile August MOR	1.50	\$235.00	\$352.50
Colin Moran Total				\$728.50
<b>Invoices, Fees and Retention Applications</b>				
<i>Colin Moran</i>				
10/20/2022	Compile August MSR	1.00	\$235.00	\$235.00
Colin Moran Total				\$235.00
<i>Roger Gorog</i>				
10/20/2022	Review September monthly staffing report and compare to budget	1.10	\$580.00	\$638.00
Roger Gorog Total				\$638.00

# EXHIBIT "D"

**Summary of SierraConstellation Partners Expenses by Category**

For the Period October 1st through October 31st

**Reimbursable Expenses**

**Amount**

NA

# EXHIBIT "E"

**Summary of SierraConstellation Partners Expenses by Detail**

For the Period October 1st through October 31st

<u>Activity</u>	<u>Date</u>	<u>Employee</u>	<u>Description</u>	<u>Amount</u>
NA				

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 2818 La Cienega Avenue, Los Angeles, CA 90034

A true and correct copy of the foregoing document entitled **DEBTOR'S NOTICE OF MONTHLY FEE STATEMENT OF SIERRACONSTELLATION PARTNERS, LLC** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **November 30, 2022**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- Kyra E Andrassy kandrassy@swelawfirm.com, lgarrett@swelawfirm.com;gcruz@swelawfirm.com;jchung@swelawfirm.com
- Todd M Arnold tma@lnbyg.com
- Jerrold L Bregman jlbregman@bg.law, ecf@bg.law
- Ryan Coy rcov@bg.law, ecf@bg.law
- Marguerite Lee DeVoll mdevoll@watttieder.com, zabrams@watttieder.com
- Karol K Denniston karol.denniston@squirepb.com, travis.mcroberts@squirepb.com;sarah.conley@squirepb.com;karol-k-denniston-9025@ecf.pacerpro.com
- Oscar Estrada oestrada@ttc.lacounty.gov
- Danielle R Gabai dgabai@danninggill.com, dgabai@ecf.courtdrive.com
- Thomas M Geher tmg@jmbm.com, bt@jmbm.com;fc3@jmbm.com;tmg@ecf.inforuptcy.com
- David B Golubchik dbg@lnbyg.com, stephanie@lnbyb.com
- Andrew Goodman agoodman@andyglaw.com, Goodman.AndrewR102467@notify.bestcase.com
- Jonathan Gottlieb jdgt@lnbyg.com
- James Andrew Hinds jhinds@hindslawgroup.com;mduran@hindslawgroup.com, mduran@hindslawgroup.com
- Robert B Kaplan rbk@jmbm.com
- Jane G Kearl jkearl@watttieder.com
- Jennifer Larkin Kneeland jkneeland@watttieder.com, zabrams@watttieder.com
- Michael S Kogan mkogan@koganlawfirm.com
- Noreen A Madoyan Noreen.Madoyan@usdoj.gov
- John A Moe john.moe@dentons.com, glenda.spratt@dentons.com;derry.kalve@dentons.com
- Samuel A Newman sam.newman@sidley.com, samuel-newman-2492@ecf.pacerpro.com;laefilingnotice@sidley.com
- Ryan D O'Dea rodea@shulmanbastian.com, lgauthier@shulmanbastian.com
- Sharon Oh-Kubisch sokubisch@swelawfirm.com, gcruz@swelawfirm.com;lgarrett@swelawfirm.com;jchung@swelawfirm.com
- Hamid R Rafatjoo hrafatjoo@raineslaw.com, bclark@raineslaw.com
- Ronald N Richards ron@ronaldrichards.com, 7206828420@filings.docketbird.com
- Joseph M Rothberg jmr@lnbyg.com
- Victor A Sahn victor.sahn@gmlaw.com, vsahn@ecf.courtdrive.com;pdillamar@ecf.courtdrive.com;patricia.dillamar@gmlaw.com, Karen.Files@gmlaw.com
- William Schumacher wschumac@milbank.com, autodocketecf@milbank.com
- David Seror dseror@bg.law, ecf@bg.law
- Zev Shechtman zshechtman@DanningGill.com, danninggill@gmail.com;zshechtman@ecf.inforuptcy.com

- Lindsey L Smith lls@lnbyb.com, lls@ecf.inforuptcy.com
- Paul Sorrell psorrell@lavelysinger.com
- Howard Steinberg steinbergh@gtlaw.com, pearsallt@gtlaw.com; lalidock@gtlaw.com
- United States Trustee (LA) ustpregion16.la.ecf@usdoj.gov
- Genevieve G Weiner gweiner@sidley.com, laefilingnotice@sidley.com; genevieve-weiner-0813@ecf.pacerpro.com
- Jessica Wellington jwellington@bg.law, ecf@bg.law

**2. SERVED BY UNITED STATES MAIL:** On **November 30, 2022**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on **November 30, 2022**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

*None.*

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

November 30, 2022  
*Date*

Lourdes Cruz  
*Type Name*

/s/ Lourdes Cruz  
*Signature*



In re Crestlloyd, LLC  
D UST Receiver RSN + Amended 20  
Largest  
File No.: 9562

Debtor  
Crestlloyd, LLC  
c/o SierraConstellation Partners LLC  
355 S. Grand Avenue Suite 1450  
Los Angeles, CA 90071

Noreen A Madoyan  
Office of the United States Trustee  
915 Wilshire Blvd., Suite 1850  
Los Angeles, CA 90017

Counsel For Receiver  
Brutkus Gubner Rozansky Seror  
Weber LLP  
David Seror/Jessica Wellington  
21650 Oxnard Street, Suite 500  
Woodland Hills, CA 91367

Biabani & Associates, Inc.  
Attn: Alex Biabani  
1600 Sawtelle Bl #104  
Los Angeles, CA 90025

Bradford Sheet Metal  
4164 Sopp Road  
Mojave, CA 93501

Branden Williams  
257 N. Cannon Dr., 2nd Fl.  
Beverly Hills, CA 90210

C.G.S. Custom Glass Specialists  
Attn: Tom Yang  
4536 Ish Drive  
Simi Valley, CA 93063

CAD Stone Works Inc.  
Attn: Cesar Hernandez  
4533 Van Nuys Bl. #201  
Sherman Oaks, CA 91403

Centurion Air, LLC  
Attn: Michael T. Pyle  
13932 Arrow Creek Road  
Draper, UT 84020

Davidson Accountancy Corp.  
William N. Davidson, CPA  
14011 Ventura Blvd., Ste. 302  
Sherman Oaks, CA 91423

Creative Art Partners  
6542 Hayes Dr.  
Los Angeles, CA 90048

Italian Luxury Design  
4 NE 39 St.  
Miami, FL 33137

Jabs Pools and Spas, LLC  
Attn: Georgina Rendon  
8055 Matilija Ave.  
Panorma City, CA 91402

Dennis Palma  
146 Beach Way  
Monterey, CA 93940

KN Coating  
201 E. Tamarack Ave  
Inglewood, CA 90301

LA DWP  
P.O. Box. 30808  
Los Angeles, CA 90030

Vesta (aka Showroom Interiors, LLC)  
Attn: Julian Buckner  
8905 Rex Road  
Pico Rivera, CA 90660

Made by TSI, Inc.  
888 Biscayne Blvd #209  
Miami, FL 33132

Midland Contractors, Inc.  
Attn: Bruce Partovi  
Po Box 8312  
Van Nuys, CA 91409

West Valley Green Landscaping, Inc.  
14761 Tupper St.  
Panorama City, CA 91402

The Vertex Companies, Inc.  
12100 Wilshire Blvd 8th floor  
Los Angeles CA 90025-0000

West Coast Gates  
339 Isis Ave.  
Inglewood, CA 90301

**Attorneys for Richard Saghian**  
Samuel A. Newman, Esq. **RSN**  
Genevieve G. Weiner, Esq.  
Sidley Austin LLP  
555 West Fifth Street, Suite 4000  
Los Angeles, CA 90013

**Attorneys for Richard Saghian**  
Amy P. Lally, Esq. **RSN**  
Sidley Austin LLP  
1999 Avenue of the Stars, 17th Floor  
Los Angeles, CA 90067